



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Harry J Hicks III
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: February 27, 2004

SUBJECT: APA Quarterly Report for FY 2004,
First Quarter Ending 12/31/03

The following are the APA Program's results for the first quarter of FY 2004 ("Q1").

APAs Completed

The APA Program completed 20 APA matters in Q1, consisting of 14 bilateral APAs, 4 unilateral APAs, and 2 unilateral APA amendments.

Negotiating-Position Papers

The APA Program completed 9 bilateral negotiating position papers in Q1.

Annual Reports

The APA Program completed its review of, and closed 53 annual reports in Q1.

New Matters

The APA Program received 30 new APA matters in Q1, including 14 bilateral and 16 unilateral APA matters. Seven of the bilateral matters and 9 of the unilateral matters involve a renewal.

APA Inventory

The APA Program has an ending inventory of 229 open matters.¹ This consists of 164 bilateral and 65 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of December 31, 2003. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,

Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

1. This equals beginning Q1 inventory of 219 matters, plus 30 receipts, less 20 closures {219 + 30 - 20 = 229}.

2. The 229 open matters include 35 pending dollar filings (19 bilateral and 16 unilateral). Thus

- The APA Program has an inventory of 194 active cases, i.e., 229 open matters less 35 pending dollar filings.
- The 194 active cases consist of 145 bilateral cases (164 total bilateral matters less 19 pending bilateral dollar filings) and 49 unilateral cases (65 total unilateral matters less 16 pending dollar filings).
- The APA Program has forwarded 97 of the 145 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 97 cases, consisting of 48 bilateral (145 active bilateral cases less 97 forwarded to Competent Authority) and 49 active unilateral cases.